

FILED

FEB 01 2021

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY _____, DEPUTY

KIMBERLY S. WOMACK,

Plaintiff,

v.

MERCY HOSPITAL OKLAHOMA CITY,
INC., et al.,

Defendants.

Case No. 5:19-cv-00683-R

PLAINTIFF'S STATUS UPDATE AND REQUEST FOR EXTENSION OF TIME

Plaintiff, Kimberly Womack requests an additional 60-day Extension of Time pursuant to this Court's Order dated December 7, 2020 in the above-entitled action wherein the parties were "encouraged to pursue any form of alternative dispute resolution they desire, without need for Court approval of the same". Plaintiff requests to extend the Scheduling Order timeline for an additional 60 days or until April 2, 2021, pending further alternative dispute resolution, Discovery and time to obtain Plaintiff counsel. Plaintiff submits that extensions are necessary and most likely will continue to be required due to the current pandemic and the added burdens it has caused. In addition, Plaintiff submitted Interrogatories, Requests for Admissions and Request for Production of Documents in October 2020 but has not yet received any initial Discovery from Defendant, to date. Plaintiff cannot submit witness and exhibit lists and meet current timelines or adequately proceed until Defendant complies with Plaintiff's Discovery request. In addition, Plaintiff requests the additional time to obtain counsel. Plaintiff's disabilities and the pandemic have made it difficult to confer with counsel. Plaintiff submits that both parties have mutually agreed that alternative dispute resolution is the most ideal option

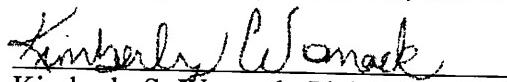
mutually beneficial to both parties as well as the Court in order to eliminate further case backlog and additional time and expense.

Parties have engaged in preliminary discussions regarding possible alternative dispute resolution and report that the parties have not yet made significant progress toward initial discovery or mediation discussions. The Court's aforementioned Order for approval for mediation and/or any other alternative dispute resolution process that may be agreed upon by the parties within the prior 60-day extension period has expired. Plaintiff requests an additional 60-day extension to the current Scheduling Order.

The parties have discussed the mutual benefit of dispute resolution and are hopeful they will reach an agreement on the issues pursuant to this cause of action.

The Plaintiff respectfully submits this Status Update and for the aforementioned reasons, the parties respectfully ask the Court to: (1) suspend for 60-days all deadlines pursuant to this Status Report or until April 2, 2021; and (2) require the parties to update the Court on the status of their case resolution efforts by no later than April 2, 2021. If additional substantial progress toward settlement terms has not been made by that time, the parties propose on that date to submit new timelines that are consistent with the time frames set forth by the Court.

Respectfully submitted, this 1st day of February 2021.



Kimberly S. Womack, Plaintiff, pro se
12905 Elrond Drive
Oklahoma City, OK. 73170
(405) 312-3189

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document by Kimberly S. Womack, has been served upon the Defendant, Mercy Hospital's, attorneys of record, **Justin P. Grose, Ogletree, Deakins, Nash, Smoak & Stewart, P.C.**, by email on the 1st day of February 2021.

Kimberly Womack
Kimberly S. Womack, Plaintiff, pro se
12905 Elrond Drive
Oklahoma City, OK. 73170
(405) 312-3189